

JUDGE'S COPY

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN  
MARRONE, wife, both individually and  
in their capacity as parents and guardians  
for VIDA MARRONE, a minor, and  
MATTHEW ADAM MARRONE,

Plaintiffs

vs.

ALLSTATE INSURANCE COMPANY,  
LINDA M. EDLEMAN, FRED SCHAFER,  
MT. GRETNAL REALTY, and HOUSE  
MASTERS

Civil Action No.: 1:CV-01-0773

(U.S. District Judge Yvette Kane)

**JURY TRIAL DEMANDED**

FILED  
HARRISBURG,  
OCT 18 2002  
MARY E. D'ANDREA, C.  
per Deputy Clerk

**MOTION FOR EXTENSION OF TIME**

AND Now come the Plaintiffs, by and through their counsel of record, Tarasi, Tarasi & Fishman, P.C., Louis M. Tarasi, Jr., Esquire, and Gianni Floro, Esquire, and hereby file this Motion for Extension of Time, and in support thereof says the following:

1. On July 3, 2002, the Honorable Yvette Kane entered an Order, after a status conference with the parties in this matter. The date set for the Report of Experts was September 13, 2002.
2. The Plaintiffs' medical causation expert was unable to generate his expert reports by September 13, 2002, due to the doctor's busy schedule.
3. The Plaintiffs respectfully seek leave of Court to allow the Plaintiffs to disclose to the Defendants their expert reports in this matter within sixty (60) days of the date of said Order amending the Order of July 3, 2002.
4. Counsel for the Defendants do not concur in the presentment of this motion for an

extension of time. (L.R. 7.1)

5. The Plaintiffs therefore request that the Order be further amended to provide for a sixty (60) day extension of time for the Plaintiffs to file their expert reports.

Wherefore, the Plaintiffs respectfully request that this District Court enter an Order accommodating and extending the Plaintiffs' disclosure of their expert reports and other Court dates accordingly in this case for an additional sixty (60) days for the Plaintiffs' disclosure of their medical causation expert and other required Court dates accordingly.

Respectfully submitted,

TARASI, TARASI & FISHMAN, P.C.

By: 

Gianni Floro, Esquire  
PA J.D. No. 85837  
Attorney for the Plaintiffs  
510 Third Avenue  
Pittsburgh, PA 15219  
P: (412) 391-7135  
F: (412) 471-2673

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

---

JACK MARRONE, husband, KAREN	:	
MARRONE, wife, both individually and	:	Civil Action No.: 1:CV-01-0773
in their capacity as parents and guardians	:	
for VIDA MARRONE, a minor, and	:	
MATTHEW ADAM MARRONE,	:	
	:	
Plaintiffs	:	
	:	
vs.	:	
	:	
ALLSTATE INSURANCE COMPANY,	:	
LINDA M. EDLEMAN, FRED SCHAFER,	:	
MT. GRETNAL REALTY, and HOUSE	:	
MASTERS	:	

---

**ORDER**

AND NOW, this \_\_\_\_\_ day of July, 2002, upon the Plaintiffs' "Motion for Extension of Time," and with good cause shown, it is hereby ORDERED that fact discovery and the other required Court dates accordingly will be extended an additional sixty (60) days, and that the Amended Case Management Order of February 19, 2002, shall be further amended to accommodate the additional sixty (60) days of fact discovery and the other required Court dates accordingly will be extended an additional sixty (60) days.

BY THE COURT:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Yvette Kane, Judge  
Middle District of Pennsylvania

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MOTION FOR  
EXTENSION OF TIME** was served on counsel for the Defendants on this 18th day of  
October, 2002, by the United States Mail, First Class, Postage prepaid addressed as follows, and  
telefax:

James G. Nealon, III, Esquire  
*Telefax (717) 236-9119*  
Nealon & Grover, P.C.  
2411 North Front Street  
Harrisburg, PA 17110

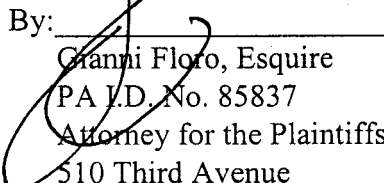
John Flounlacker, Esquire  
*Telefax (717) 237-7105*  
Thomas, Thomas & Hafer, LLP  
305 North Front Street  
Harrisburg, PA 17108

Edward A. Monsky, Esquire  
*Telefax (570) 343-9538*  
Fine, Wyatt & Carey, P.C.  
425 Spruce Street  
Scranton, PA 18501-0590

Jennifer L. Murphy, Esquire  
*Telefax (717) 232-4015*  
Duane, Morris & Heckscher, LLP  
305 North Front Street, 5th Floor  
Harrisburg, PA 17108-1003

TARASI, TARASI & FISHMAN, P.C.

Date: 10-18-02

By:   
Gianni Floro, Esquire  
PA J.D. No. 85837  
Attorney for the Plaintiffs  
510 Third Avenue  
Pittsburgh, PA 15219  
P: (412) 391-7135  
F: (412) 471-2673